

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

CARL RAGASA and KANANI
RAGASA,

Plaintiffs,

vs.

COUNTY OF KAUAI, KAUAI
FIRE DEPARTMENT, DAVID
SPROAT, ROBERT KADEN,
SIDNEY KINI and ETHAN
SAGE,

Defendants.

) CIVIL NO. 03-00540

)
) **DECLARATION OF NORMAN**
) **HUNTER**

DECLARATION OF NORMAN HUNTER

I, NORMAN HUNTER, hereby declare as follows:

1. I am 48 years old.
2. I was born and raised in and am a resident of the County of Kauai, State of Hawaii.
3. I have been a Water Safety Officer with Defendant COUNTY OF KAUAI ("COUNTY") since 1991.
4. Plaintiff CARL RAGASA ("CARL") has been a Water Safety Officer with since about 1991. I have known CARL all during that time.

5. From January 2001 to sometime in or about 2004, Defendant ROBERT KADEN ("KADEN") was the Battalion Chief at Defendant KFD who was in charge of the overall supervision of all Water Safety Officers employed by the COUNTY. I knew KADEN for several years before the time that he became the Battalion Chief.

6. From 2000 to the present, Defendant ETHAN SAGE (hereinafter "SAGE") has been a Water Safety Officer with the COUNTY. I have known SAGE during all that time.

7. In January 2002, I was an acting Supervisor for Water Safety Program. I worked closely with KADEN during that time.

8. On at least four (4) separate occasions during that month alone, I heard KADEN say "F— CARL! I'm going to get him fired!"

9. During January 2002, I heard KADEN and SPROAT making plans to:

- A. write a letter to CARL designed to make CARL angry and commit assault upon KADEN;
- B. have KADEN deliver the letter to CARL at Tower 1;

- C. have KADEN wear an electronic recording device in order to record the assault that SPROAT and KADEN hoped CARL would commit when the letter was delivered.

9. On March 27, 2002, KADEN and I picked up SAGE in a COUNTY vehicle while he was at work at Tower 9 to take him to the Kauai Police Department ("KPD"). SAGE told us that he did not want to go, but KADEN told SAGE that he would be fired if he did not do what he wanted. I did not want to go pick up SAGE or be involved, but KADEN told me that I would be fired for insubordination if I refused to go along with him.

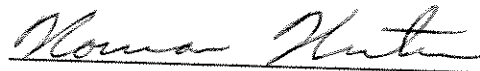
10. Between March 27, 2002 and the date herein, SAGE has told me on at least ten (10) separate occasions that:

- A. while at KPD, he made several false statements to KPD with Defendant SIDNEY KINI ("KINI") by his side and KADEN over his shoulder about what had happened at Tower 1 on March 20 and March 22, 2002 among he, CARL and KINI;
- B. He made the false statements about CARL to KPD because KADEN, KINI and SPROAT were intimidating him and pressuring him into doing so;
- C. KADEN, KINI and SPROAT had told him on many occasions that if he did not falsely implicate CARL as having committed crimes against him and

KINI on March 20, 2002 and March 22, 2002, then KADEN, KINI and SPROAT would see to it that he would be fired from his job as a Water Safety Officer.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE AND BELIEF.

Executed this 24 day of October 24, 2005 at Hanalei, Kauai, Hawaii.



NORMAN HUNTER

DECLARATION OF NORMAN HUNTER; Carl Ragasa and Kanani Ragasa v. County of Kauai, et. al, In the United States District Court for the District of Hawaii, Civil No. CV 03-00162 (BMK).
